

#3602  
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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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August 12, 2010

TO: Internal File

THRU: Ingrid Campbell, Lead *IG*

FROM: Priscilla Burton, Soil Scientist *PB m sos*

RE: Underground Mine Water Treatment, West Ridge Resources, Inc., West Ridge Mine, C/007/0041, Task ID #3602

## SUMMARY:

This amendment was provided to abate NOV 10063 issued 7/21/2010 for UPDES exceedences from UPDES outfall #2 contributing to increased sediment/coal fines outside the permit area in the "C" Canyon drainage tributary to Grassy Trail Creek. This amendment will re-construct the reclaimed, (previously) temporary catchment structures C and E (see Tasks 3309 and 3543). The catchment structures are described in Appendix 5-15 to the Mining and Reclamation Plan.

A soil survey is required for all disturbed areas. Please provide the following in accordance with:

**R645-301-222**, Catchments C & E will be included in the disturbed area. As such, the requirements of R645-301-222 need to be addressed. The following should be accomplished: Enlarge Map 2-1 Regional Soil Map to encompass the catchment areas C & E. Provide an Order 1 Soil Map and survey for the catchment locations (A, C, E). Provide a composite soil sample analysis from each catchment in the disturbed area (A, C, E).

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**TECHNICAL ANALYSIS:**

**ENVIRONMENTAL RESOURCE INFORMATION**

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

**SOILS RESOURCE INFORMATION**

Regulatory Reference: 30 CFR 783.21; 30 CFR 817.22; 30 CFR 817.200(c); 30 CFR 823; R645-301-220; R645-301-411.

**Analysis:**

Locations of catchments are shown on Map 1-1. Limited information was available about the vegetation and soils of the riparian zone and stream channel bottom prior to initial construction in 2009. Pre-construction photographs in Attachment 8 of Appendix 5-15 were provided for the stream corridor, in compliance with R645-301-750.

Reclaimed catchments C & E will be re-disturbed again with this construction. The catchments will be included in the disturbed area. As such, the requirements of R645-301-222 need to be addressed. The following should be accomplished: enlarge Map 2-1 Regional Soil Map to encompass the catchment area. Provide an Order 1 Soil Map and survey for the catchment locations and provide a composite soil sample analysis from each catchment disturbed area.

**Findings:**

The information provided does not meet the minimum requirements for baseline information. Prior to approval, please provide the following, in accordance with:

**R645-301-222**, Catchments C & E will be included in the disturbed area. As such, the requirements of R645-301-222 need to be addressed. The following should be accomplished:  
Enlarge Map 2-1 Regional Soil Map to encompass the catchment areas C & E.  
Provide an Order 1 Soil Map and survey for the catchment locations (A, C, E).  
Provide a composite soil sample analysis from each catchment in the disturbed area (A, C, E).

# RECLAMATION PLAN

## GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

### Analysis:

Appendix 5-15, pp. 5-8 describe reclamation of the catchment basins as per BLM requirements in the ROE document. Reclamation of the re-constructed catchments will be completed in the same way. DOGM visited the reclaimed catch basins in on June 9, 2010, see inspection report #2394. Two seed mixes for the regraded sites are provided in Attachment 13. Seed will be hand broadcast and raked in.

### Findings:

The information provided is acceptable.

### RECOMMENDATIONS:

A soil survey is required for all disturbed areas.